

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

IN RE:)	Chapter 7
Carol G Braswell)	Case No. 15-11247
DEBTORS/MOVANTS)	

MOTION TO REDEEM PROPERTY UNDER SECTION 722

COME NOW the Debtors, Carol G Braswell, by and through counsel, and state the following:

1.

Prior to the Debtor filing Chapter 7, United Consumer Financial financed personal property.

2.

That the above referenced property is tangible personal property intended primarily for personal, family and household use of the debtors and the debtors' family.

3.

Debtor filed a Chapter 7 Bankruptcy in the United States Bankruptcy Court, Southern District of Georgia; Augusta Division on or about March 16, 2016.

4.

That the above referenced property is exempted collateral.

5.

Debtor contends that the value of the above referenced collateral is \$100.00.

6.

That pursuant to 11 U.S.C. 722, the debtor desires to redeem such property from the lien of the creditor by paying to the creditor \$100.00.

WHEREFORE, the Debtor moves this honorable court to enter an order fixing the amount of the creditor's lien on the personal property described in paragraph 1 above at \$100.00, and permit the debtor to redeem the above described property by paying to United Consumer Financial the sum of \$100.00 and that United Consumer Financial's lien shall be deemed release at the time of payment.

DATED this 13th day of April, 2016.

s/Angela McElroy-Magruder
Angela McElroy – Magruder
Attorney for the Debtor

Claeys, McElroy-Magruder & Kitchens
512 Telfair Street
Augusta, Georgia 30901
(706) 724-6000

**IN THE UNITED STATES BANKRUPTCY COURT
THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

IN RE:)	
)	
Carol G Braswell)	CHAPTER 7
DEBTORS/MOVANTS)	CASE NO: 15-11247
)	
United Consumer Financial,)	
RESPON)	

NOTICE OF MOTION TO REDEEM PERSONAL PROPERTY

Debtor(s) has filed a Motion with the Court seeking permission to redeem personal property under section 722.

Your rights may affected. You should read these papers carefully and discuss them with you attorney. If you do not have an attorney, you may wish to consult one.

If you have legal grounds to oppose the motion, or if you wish the Court to consider your views on the motion, you must file a written request for a hearing with the Clerk of the Bankruptcy Court before the expiration of twenty-one (21) days from the date stated in the certificate of service.

If you mail your request for hearing to the court, you must mail it early enough so that it will be received before the time referenced above.

Any request for a hearing must also be mailed to the moving party and all other persons indicated in the certificate of service attached to the pleadings.

If a timely request is filed, you will receive a notice of the date, time and place of hearing.

If you or your attorney do not take these steps, the court will decide that you do not oppose the relief sought in the Motion and will enter an order granting it.

Dated this 13th day of April, 2016.

S/Angela McElroy-Magruder
Angela McElroy-Magruder
GA Bar No. 113625

Claeys, McElroy-Magruder & Kitchens
512 Telfair Street
Augusta, Georgia 30901
(706) 724-6000

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the within and foregoing Amended Motion to Redeem, along with the Notice on Motion to Redeem, by placing same in the United States Mail with proper postage affixed thereon to insure delivery, addressed as follows:

United Consumer Financial
ATTN: Servicing Agent/Officer
865 Bassett Road
Westlake OH 44145

Bass & Associates
Attn: Servicing Agent/Officer
3936 E Fort Lowell Road, Ste 200
Tucson AZ 85712

United States Trustee
Johnson Square Business Center
2E Bryan Street, Ste 725
Savannah, Georgia 31401

Chapter 7 Trustee
Todd Boudreaux
493 Furys Ferry Road
Augusta GA 30907

This 13th day of April, 2016.

s/Angela McElroy-Magruder
Angela McElroy-Magruder
Georgia Bar # 113625

CLAEYS, MCELROY-MAGRUDER & KITCHENS
512 Telfair Street
Augusta, Georgia 30901
(706) 724-6000